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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

STATE OF ARIZONA,

Plaintiff,

v.

PAUL D. PETERSEN (001),
(Counts 1-32)

and

LYNWOOD JENNET (002),
(Counts 1-32)

Defendants.

Case No:

85 SGJ 77

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: CONSPIRACY, a Class 2 Felony, in violation of A.R.S. §§ 13-1003, 13-1802 and 13-2310

COUNT 2: FRAUDULENT SCHEMES AND ARTIFICES, a Class 2 Felony, in violation of A.R.S. § 13-2310

COUNT 3: **THEFT**, a Class 2 Felony, in violation of A.R.S. § 13-1802

COUNTS 4-31: FRAUDULENT SCHEMES AND PRACTICES, Class 5 Felonies, in violation of A.R.S. § 13-2311

COUNT 32: FORGERY, a Class 4 Felony, in violation of A.R.S. § 13-2002

The Arizona State Grand Jury accuses, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, charging on this 7th day of October, 2019 that in or from Maricopa County, Arizona:

COUNT 1

CONSPIRACY

On or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, conspired to commit: Fraudulent Schemes and Artifices, Theft, and Fraudulent Schemes and Practices, in violation of A.R.S. §§ 13-1003, 13-2310, 13-2311, 13-1802, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

Said offense occurred when on or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, with intent to promote or aid the commission of an offense(s), to wit: Fraudulent Schemes and Artifices, Theft, and Fraudulent Schemes and Practices, agreed with one or more persons that at least one of them or another person would engage in conduct constituting the offense, and one of the persons committed an overt act in furtherance of the conspiracy to wit: submitting false applications to the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM to obtain benefits, in violation of A.R.S. §§ 13-1003, 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, 13-703, and 13-801.

COUNT 2

FRAUDULENT SCHEMES AND ARTIFICES

On or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained services provided by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM by means of fraudulent representations, TO WIT: **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)** facilitated travel for pregnant women from the Republic of the Marshall Islands (hereinafter, "RMI") to come to Arizona for the purpose of giving a child up for adoption. After the birth of the child,

PAUL D. PETERSEN (001) and LYNWOOD JENNET (002) facilitated travel for these women to leave Arizona. In several instances the women returned directly to the RMI.

In 1983, the United States entered into a Compact of Free Association (hereinafter, the "Compact") with the RMI government. The United States and the RMI signed an Amended Compact in 2003. Section §141 of the Compact grants RMI citizens the ability to freely enter, and take up employment within the United States. Section §141(b) prohibits RMI citizens from entering the United States under the Compact agreement if their travel is for the purpose of adoption. In pertinent part, the Compact states, "(b) Notwithstanding subsection (a) of this section, a person who is coming to the United States pursuant to an adoption outside the United States, or of adoption in the United States, is ineligible for admission under the Compact and the Compact as amended." The scheme in this case fraudulently represented the pregnant women in question were residents of Arizona in order to obtain medical services by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM because without residency ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM services cannot be obtained. This fraudulent scheme is in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 3

THEFT

On or between November 30, 2015 and May 30, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, diverted another's services, TO WIT: ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, to the person's own or another's benefit without authority to do so, in violation of A.R.S. §§ 13-1801, 13-1802, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702, and 13-801.

COUNT 4

FRAUDULENT SCHEMES AND PRACTICES

On or about December 12, 2016, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for E.T. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 5

FRAUDULENT SCHEMES AND PRACTICES

On or about January 18, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for M.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 6

FRAUDULENT SCHEMES AND PRACTICES

On or about October 30, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for K.T. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 7

FRAUDULENT SCHEMES AND PRACTICES

On or about December 04, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for S.K. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 8

FRAUDULENT SCHEMES AND PRACTICES

On or about December 09, 2017, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.T. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 9

FRAUDULENT SCHEMES AND PRACTICES

On or about January 09, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely

represented in the benefit application for L.L. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 10

FRAUDULENT SCHEMES AND PRACTICES

On or about January 11, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for H.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 11

FRAUDULENT SCHEMES AND PRACTICES

On or about January 17, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for C.L. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 12

FRAUDULENT SCHEMES AND PRACTICES

On or about January 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for A.N. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 13

FRAUDULENT SCHEMES AND PRACTICES

On or about January 26, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.B. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 14

FRAUDULENT SCHEMES AND PRACTICES

On or about February 05, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for N.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 15

FRAUDULENT SCHEMES AND PRACTICES

On or about April 27, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.S. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 16

FRAUDULENT SCHEMES AND PRACTICES

On or about April 27, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for M.A. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 17

FRAUDULENT SCHEMES AND PRACTICES

On or about May 7, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely

represented in the benefit application for L.C. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 18

FRAUDULENT SCHEMES AND PRACTICES

On or about May 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for E.K. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 19

FRAUDULENT SCHEMES AND PRACTICES

On or about May 23, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for S.N. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 20

FRAUDULENT SCHEMES AND PRACTICES

On or about June 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for T.H. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 21

FRAUDULENT SCHEMES AND PRACTICES

On or about June 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 22

FRAUDULENT SCHEMES AND PRACTICES

On or about June 18, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for K.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 23

FRAUDULENT SCHEMES AND PRACTICES

On or about July 12, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for W.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 24

FRAUDULENT SCHEMES AND PRACTICES

On or about August 1, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for A.S. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 25

FRAUDULENT SCHEMES AND PRACTICES

On or about August 28, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely

represented in the benefit application for H.J. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 26

FRAUDULENT SCHEMES AND PRACTICES

On or about October 19, 2018, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for A.D. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 27

FRAUDULENT SCHEMES AND PRACTICES

On or about March 11, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.T. stating she is an Arizona Resident t, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 28

FRAUDULENT SCHEMES AND PRACTICES

On or about March 20, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner

related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for H.K. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 29

FRAUDULENT SCHEMES AND PRACTICES

On or about April 03, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for V.P. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 30

FRAUDULENT SCHEMES AND PRACTICES

On or about April 08, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for M.H. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 31

FRAUDULENT SCHEMES AND PRACTICES

On or about May 29, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, pursuant to a scheme or artifice to defraud or deceive, in a manner related to the business conducted by the ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM, used any false writing or document knowing such writing or document contained any false, fictitious or fraudulent statement TO WIT: Falsely represented in the benefit application for R.A. stating she is an Arizona Resident, in violation of A.R.S. §§ 13-2311, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

COUNT 32

FORGERY

On or about February 13, 2019, **PAUL D. PETERSEN (001) and LYNWOOD JENNET (002)**, with the intend to defraud, offers or presents a forged instrument or one that contains false information, TO WIT: Christyann Talley's State residency document written by Lynnwood Jennet, in violation of A.R.S. §§ 13-2002, 13-301, 13-302, 13-303, 13-304, 13-701, 13-702 and 13-801.

____
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: ______________________________

____
EVAN MALADY
Assistant Attorney General

____
Foreperson of the State Grand Jury

#8248587